

REMARKS

The above-identified Office Action dated July 1, 2009, contained a final rejection of claims 1-28. Claims 1, 13, 24 and 27 have been amended in an effort to **clarify** claims 1, 13, 24 and 27. Since the amendments to claims 1, 13, 24 and 27 are for clarification purposes, clearly a new search is **not** required by the Examiner. As such, the foregoing amendments to the claims and the remarks below are intended to place the case in condition for allowance, or alternately in better form for consideration on appeal under 37 CFR 1.116. Thus, it is respectfully requested that the amendments to claim1 be entered despite the finality of the present rejection.

Rejections of claims 1-2, 12-13, 24-25 and 27-28 under 35 U.S.C. § 103

The Office Action rejected claims 1-2, 12-13, 24-25 and 27-28 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lee et al. (U.S. Patent No. 2003/193593) in view of Vernier (U.S. Patent Publication No. 2004/0036778).

The Applicants respectfully traverse this rejection and contend that all of the elements of the Applicants' independent claims are not disclosed, taught or suggested by the combination of Lee et al. in view of Vernier.

For example, Lee et al. simply disclose using X-Y addressable active pixel sensors, while Vernier merely disclose a slit camera with user defined scan lines (see Abstract of Vernier). Although Vernier discloses selected pixels being stored in a static portion of an image buffer and remaining pixels of the frame being stored in a dynamic portion of the image buffer, this is very different from the Applicants' independent claims. Namely, **unlike** the Applicants' independent claims, in Vernier, the selected pixels relate to a current position of the scan line and the static and dynamic portions relate to pixels of scan lines of moving objects for preventing overwriting of any pixels of the static portion to display a distorted image of the moving object (see FIGS. 3-5 and Abstract of Vernier).

In contrast, clearly, Lee et al. in combination with Vernier do **not** disclose, teach or suggest at least the Applicants' claimed organizing the **entire set of pixels** (not selected pixels like Vernier) into dynamic and static partitions, each respective partition

having multiple pixels, mapping one or more of the dynamic and the static partitions to one or more of the member-pixels of the subset, respectively, and reading the static partitions once and the dynamic partitions multiple times (Vernier does not specify different read frequencies of the static and dynamic partitions) and processing extra partition-read requests for creating a series of images corresponding in time to more **frequently read partitions** (the static and dynamic portions in Vernier are related to scan lines for preventing overwriting issues).

Consequently, because Lee et al. in combination with Vernier do **not** disclose, teach or suggest all of the features of the Applicants' independent claims, Lee et al. in combination with Vernier cannot render the claims obvious.

Rejections of claims 3-11, 14-23 and 26 under 35 U.S.C. § 103

The Office Action rejected claims 3-9, 14-20, 23 and 26 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lee et al. in view of Vernier and further in view of Yoneyama (JP 04313949). The Office Action rejected claims 10-11 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lee et al. in view of Vernier and further in view of Horie et al. (U.S. Patent No. 6,480,624). The Office Action rejected claims 21-22 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lee et al. in view of Vernier in view of Yoneyama and further in view of Horie et al.

The Applicants respectfully traverse these rejections and contend that all of the elements of the Applicants' independent claims are not disclosed, taught or suggested by any combination of Lee et al. in view of Yoneyama, Vernier and/or Horie et al.

Specifically, Yoneyama merely disclose V_A , V_B and V_C of picture elements A, B and C (the Examiner related this to organizing the entire set of pixels and mapping the partitions), while Horie simply disclose a luminance calculator for calculating luminance information of a picked up color image based on image data of each of a plurality of color components constituting the color image (see Abstract of Horie).

Clearly, Yoneyama and/or Horie do **not** add any features that are missing from Lee et al. and Vernier. For instance, the combined cited references still fail to disclose, teach or suggest the Applicants' claimed organizing the entire set of pixels into dynamic and static partitions, each partition having multiple pixels, mapping one or more of the

partitions one or more of the member-pixels of the subset, respectively, **reading the static partitions once and the dynamic partitions multiple times** and processing extra partition-read requests for creating a series of images corresponding in time to more frequently read partitions.

Hence, because the combined cited references do **not** disclose, teach or suggest all of the features of the independent claims, the Applicants submit that the obviousness rejections should be withdrawn.

With regard to the dependent claims, since they depend from the above-argued respective independent claims, they are therefore patentable on the same basis. (MPEP § 2143.03).

As the foregoing amendments to the claims do not raise new issues, it is the Applicants' position that they are entitled to have the changes entered to place the claims in condition for allowance, or alternately, in better condition for consideration on appeal under 37 CFR 1.116. It is, therefore, respectfully requested that the changes to claim 1 be entered despite the finality of the present rejection.

Thus, it is respectfully requested that all of the claims be allowed based on the amendments and arguments. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. Additionally, in an effort to further the prosecution of the subject application, the Applicants kindly **request** the Examiner to telephone the Applicants' attorney at **(818) 885-1575**. Please note that all mail correspondence should continue to be directed to: Please note that all correspondence should continue to be directed to:

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Respectfully submitted,
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